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Department of Environmental Conservation
Waste Management Division
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June 7, 2011

MR. SCOTT SULLIVAN
RUTLAND FUEL COMPANY
PO BOX 701
RUTLAND, VT 05702

RE: Initial Site Investigation

Site: Rutland Fuel Company, 156 Granger Street, Rutland, VT (SMS Site #2010-4081)

Dear Mr. Sullivan:

The Sites Management Section (SMS) has received the May 25, 2011 Initial Site Investigation Report. This investigation was conducted in response to my request for additional site characterization. In reviewing this report, the SMS recognizes the following conditions:

- As part of the initial site investigation, KAS first conducted a soil contamination distribution survey consisting of 13 soils borings. This was completed December 14, 2010. During this survey, soil samples screened for volatile vapors by PID (Photo-ionization detector) exhibited concentrations ranging from 0.0 to 833.2 ppm (parts per million). The findings of this investigation provided necessary information for the purpose of sighting future monitoring wells.
- On April 18, 2011, KAS directed the installation of 9 monitoring wells placed in areas of high soil contamination identified in the previous soil boring survey. An additional monitoring well was installed on the adjacent property of Keyser Energy in order to identify offsite contamination, if any. As with the soil boring survey, high levels of volatile vapors were noted by PID in soils, ranging from 0.7 to 1286 ppm.
- On April 26, 2011 KAS revisited the site to collect water samples from the monitoring well network, and conduct a groundwater water elevation survey. Groundwater surveyed exhibited a NNE flow with a gradient ranging from 2.7-4.0%. Groundwater samples collected during the site visit were analyzed for VOCs via EPA Method 8021B and TPH via EPA Method 8015 DRO. Results from the groundwater analysis indicate that contamination is present in the surficial groundwater aquifer at concentrations exceeding that of the Vermont Groundwater Enforcement Standards (VGES). The highest area of contamination is located immediately north of the loading/unloading rack MW11-4. The offsite monitoring well, MW11-8, also exhibited exceedances of VGES.
- Additional investigation was conducted to evaluate the risk to certain sensitive receptors that may adversely affect human health or the environment. KAS identified a single stormwater catch basin located in pooled water, indicating the stormwater pipe was likely clogged. Additionally, one of the onsite buildings was noted to have a basement with sump. PID screening of the basement revealed no measureable concentrations of volatile vapors. A water sample from the sump was also collected and submitted for laboratory analysis. Drinking water for the onsite buildings and surrounding buildings are thought to be sourced from the town water supply. Lastly, there are no nearby surface waters or wetlands.

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- KAS has determined that the site in operation as a bulk storage facility since the late 1920's. As such, the likely source of contamination has been attributed to small overfills of fuel oil. Although there was a single detection of MTBE, it appears unlikely that gasoline was ever stored at the site, which corresponds with paper records.

Based on the report information, the SMS agrees with the findings and supports the recommendations cited in the report. Please have your environmental consultant perform the following.

- **Further define the degree and extent of contamination to the soil.** Offsite impacts have been identified but the extent to which this contamination reaches is unknown. A sufficient number of monitoring wells should be installed in order to evaluate the extent and degree of contamination outside of the current area of investigation.
- **Conduct a groundwater sampling event.** Groundwater should be sampled in a coordinated effort to assess the entire monitoring network, including the basement sump. Samples should be analyzed via EPA Method 8021B for VOC's. In order to evaluate a wider spectrum of contaminants, please analyze the MW11-4 groundwater sample via EPA Method 8260. If unidentified peaks from the previous sampling round fall within the range of PAH's, please collect and analyze one sample via EPA Method 8270.
- **Assess the potential for contaminant impact on sensitive receptors.** Base this update on all available information and include basements of adjacent buildings, nearby surface water, any proximal drinking water sources, wetlands, sensitive ecologic areas, outdoor or indoor air, sewers, or utility corridors.
- **Submit a groundwater investigation report that describes the extent of contamination.** *As appropriate* include any analytical data, a site map showing the location stockpiled soils and monitoring or sample locations; an area map; detailed well logs; a groundwater contour map; and an iso-contour map of identified and assumed contaminant concentration gradients to aid in visualizing contaminant migration.
- **Please submit a work plan and cost estimate.** This should address the abovementioned requests and include a map of planned monitoring wells locations for approval. Please submit within 14 days of receiving this letter.

Please feel free to call me with any questions you may have. I can be reached at (802) 241-1081.

Sincerely,



Alex Geller
Environmental Analyst
Sites Management Section

CC: Jeremy Roberts, KAS w/o enclosure (via e-mail)